

DECLARATION OF ALEXANDER SHARRIGAN

I, Alexander Sharrigan, declare:

1. The facts stated herein are personally known to me and I have first-hand knowledge thereof. If called upon to do so, I could and would testify hereto under oath.

2. I am an Information Technology Specialist, located in Los Angeles, California, who provides IT support and consulting services as an independent contractor. I have worked as an IT Specialist for the past 17 years. My career in Computer Science began in 2003 when I worked as a Quality Assurance Tester for Vivendi Universal Games, a video game publisher. At Vivendi Universal Games, my primary job duties entailed software engineering, as I was required to write and analyze test cases, as well as run compatibility tests with platforms, processors, video cards, and sound cards, to ensure that the software being tested would operate properly for eventual users. At the start of my career, I was also part of the core development team for the *Call of Duty* franchise while working for the video game company, Infinity Ward. My job responsibilities at Infinity Ward were wide-ranging, as I was required to compile data into a playable game interface, manage external user accounts and internal e-mail accounts, and troubleshoot and fix hardware issues. In my career, I have successfully built and managed entire networks for companies with more than 200 users internally, and thousands of users externally. I have also created and managed complex databases to store and organize informational data for companies with specific needs. I am currently the Systems Administrator for the retail property development company, Duckett-Wilson Development Company, which entails maintaining several servers and databases, along with the company's internal network. I also currently provide IT Support services to the marketing and advertising agency, Pen & Public. While working at Pen & Public, I have developed and managed large open networks for thousands of people at digital events for notable clients, such as Facebook and GoPro. Throughout my 17-year career, I have worked as a mail server administrator, which entails managing the email accounts of hundreds of users, searching for and gathering past emails that need to be accessed and/or lost emails that need to be recovered, and importing and/or exporting data, such as emails, into an MBOX, PST, and

1 EML format. As such, I have extensive experience with and knowledge of the following mail
2 servers: Google Mail, AOL Mail, Yahoo! Mail, Exchange, and Microsoft Office Cloud services.
3 Throughout my 17-year career, I have become proficient in my use of mail applications, including
4 but not limited to, Thunderbird, Apple Mail, and Microsoft Outlook, as I have often been required
5 to import and/or export emails into a MBOX, PST, or EML format for clients. Additionally, I have
6 drafted written policies to advise users on how to import mail applications and/or to export emails
7 using mail applications on their personal computers.

8 3. I was retained as a contract IT Specialist by the North Figueroa Association and the
9 Lincoln Heights Benefit Association. As a contract IT Specialist, I was required to use my
10 expertise in IT to search for, gather, and produce emails and records, if any, that were responsive
11 to California Public Records Act requests.

12 4. I was requested to search for and save all emails between (to/from/cc/bcc) Misty
13 Iwatsu and anyone at lacity.org or lapd.online from January 2, 2014, through December 31, 2016.
14 I searched Ms. Iwatsu's computer for responsive emails. In addition, I searched the computers of
15 HPBID Board Members who wanted my assistance, for any emails between (to/from/cc/bcc) any
16 Board Member and anyone at lacity.org or lapd.online from January 2, 2014 through December
17 31, 2016. All emails discovered were collected and produced to Misty Iwatsu in MBOX format.

18 5. I was requested to search for and save all emails between staff or members of the
19 LHBID Board and anyone at the domains lacity.org, lapd.lacity.org, or lapd.online from 2017 and
20 2018; and all emails between anyone on the LHBID Board and anyone on the staff of the LHBID
21 from 2017 and 2018. I searched Ms. Iwatsu's computer for responsive emails. In addition, I
22 searched the computers of Board Members who wanted my assistance. All emails discovered
23 were collected and produced to Misty Iwatsu in MBOX format. The total file size of the MBOX
24 amounted to approximately 407 MB.

25 6. The MBOX file I provided to Ms. Iwatsu was not corrupt. I suggested to Ms.
26 Iwatsu that in reviewing and sorting the approximately 407 MB file, that she separate the relevant
27 emails and I would make them accessible using the Thunderbird mail application, which is a cost-
28 free, open source application for storing e-mails. The remaining emails that were not determined

1 by Ms. Iwatsu to be responsive, would remain accessible in the MBOX file using Microsoft
2 Outlook.

3 7. I was requested to search for and save all emails of LHBID staff or Board
4 Members and anyone at the LHBID renewal consultant regarding the LHBID renewal; and all
5 proposals, bids, inquiries and similar records received by the LHBID from prospective consultants
6 seeking to be hired for the 2018 renewal; and all contracts and MOUs between the LHBID and
7 any consultants and/or engineers relating the LHBID renewal. I searched Ms. Iwatsu's computer
8 for responsive emails and records. In addition, I searched the computers of Board Members who
9 wanted my assistance. No documents or emails were found.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct.

12 Executed on this 28th day of October, 2020, at 12:05 pm, California.

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16 Alexander Sharrigan